

**TECHNICAL REVIEW DOCUMENT**  
**For**  
**MINOR MODIFICATION TO OPERATING PERMIT 06OPWE288**

Eastman Kodak Company – Health Group  
Weld County  
Source ID 1230003

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January 2007

**I. Purpose:**

This document establishes the decisions made regarding the requested modifications to the Eastman Kodak Company – Health Group Operating Permit. This document provides information describing the type of modification and the changes made to the permit as requested by the source and the changes made due to the Division's analysis. This document is designed for reference during review of the proposed permit by EPA and for future reference by the Division to aid in any additional permit modifications at this facility. The conclusions made in this report are based on the information provided in the original request for modification submitted to the Division on November 24, 2006, various e-mail correspondence and telephone conversations with the source. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

**II. Description of Permit Modification Request/Modification Type**

Kodak submitted a request on November 24, 2006 to be allowed to install and operate a railroad car PET pellet unloading system and three pellet grinders. The source indicated that the modification met the requirements for a minor permit modification and requested that the modification be processed under the minor modification procedures in Colorado Regulation No. 3, Part C, Section X.

The source has not requested any increase in the permitted facility-wide emission limits. Requested emissions from the new equipment are below the PSD significance levels.

Colorado Regulation No. 3, Part C, Section X.A identifies those modifications that can be processed under the minor permit modification procedures. Specifically, minor permit modifications “are not otherwise required by the Division to be processed as a significant modification” (Colorado Regulation No. 3, Part C, Section X.A.6). The Division requires that “any change that causes a significant increase in emissions” be processed as a significant modification (Colorado Regulation No. 3, Part C, Section I.B.36.h.(i)). Since requested emissions are below PSD significance levels, the Division agrees that this modification qualifies as a minor modification.

### **III. Discussion of Modifications Made**

#### **Source Requested Modifications**

The Division addressed the source's requested modifications as follows:

##### **New railroad pellet unloading and pellet grinders**

The source requested that approval be given to install and operate one railroad car pellet unloading operation and three pellet grinders.

**Applicable Requirements** – The source has requested that the Division approve the construction and operation of this equipment. Since the source has requested that this unit be processed as a combined construction/operating permit using the minor modification procedures in Reg 3, Part C, Section X, no construction permit will be issued and all applicable requirements will be incorporated directly into the operating permit with this modification. The applicable requirements for this unit are as follows:

- Facility-wide emission limits will remain the same as the previous permit:
  - o VOC 48.3 tons/yr
  - o PM 11.8 tons/yr
  - o PM<sub>10</sub> 11.8 tons/yr

The emissions from the new equipment are included in the facility-wide limits.

- Construction of this source must commence within 18 months of initial approval permit issuance date or within 18 months of date on which such construction or activity was scheduled to commence as stated in the application (Reg 3, Part B, Section IV.G.4.a.(i) thru (ii)).
- No owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity.
- Pellet unloading HEPA filters shall be replaced on an annual basis.

- The dust collector shall be operated and maintained in accordance with manufacturer's recommendations

### **Emission Factors –**

Railroad car pellet unloading: The PET pellets are unloaded from the rail cars via air conveyance. The pellets are conveyed to a storage silo. The conveyance system consists of a cyclone separator, dust collector and HEPA filter. The Division considers the cyclone separator and dust collector to be integral process equipment since the main purpose is to collect the PET material, not to control emissions. Collected material is recycled back into the process. This equipment meets the requirements of PS Memo 96-4. The cyclone and dust collector can be considered when determining uncontrolled emissions. The following equation can be used to estimate emissions and is based on 0.5% of the pellet throughput being emitted as PM & PM<sub>10</sub>:

$$\text{PM \& PM}_{10} = \text{PET pellet throughput lb/yr} \times (1-0.9999) \times 0.005 \times \text{ton/2000 lb}$$

PET pellet grinders: The stored pellets are sent to 3 grinders which grind them into a powder. The material is conveyed via air conveyance through cyclone separators and a dust collector. The solids separated out by the cyclones and dust collector are sent back into the existing powder railcar unloading system. The Division considers the cyclone separators and dust collector to be integral process equipment since the main purpose is to collect the PET material, not to control emissions. Collected material is recycled back into the process. This equipment meets the requirements of PS Memo 96-4. The cyclones and dust collector can be considered when determining uncontrolled emissions. The following equation can be used to estimate emissions and is based on the maximum flow rate (which is limited by the extruder throughput) and dust collector efficiency:

$$\text{PM \& PM}_{10} = 0.02 \text{ gr/cf} \times 1207 \text{ cfm} \times 60 \text{ min/hr} \times 8760 \text{ hr/yr} \times \text{lb/7000 gr} \times \text{ton/2000 lb}$$

### **Monitoring Plan –**

- Compliance with the annual emission limits shall be determined on a rolling 12-month basis.

### **Other Modifications**

In addition to the requested modifications made by the source, the Division used this opportunity to include changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this modification.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments on other permits, with the source's requested modifications.

#### Section IV – General Conditions

- General Condition No. 3 was revised to reflect that 3.g (affirmative defense) is state-only until approved by EPA.

#### Section I – General Activities and Summary

- Added General Permit Condition 3.g to the list of State-only enforceable conditions
- Removed the reference to boilers in Condition 2.1. There are no boilers contained in this permit. This language only applies to the other Operating Permit for this facility.

#### Section III – Permit Shield

- The citation in the permit shield was corrected.

#### Section IV – General Permit Conditions

- The definition of prompt was changed in Condition 21.
- Language was added to Condition 3.g.
- The language in Condition 22.d was slightly modified.

#### Appendices

- Appendix B & C have been updated to the current version (6/1/06). The requirement to determine if data was continuous has been removed from Appendix C.
- The table in Appendix F has been updated with the requested modifications.
- The EPA mailing address in Appendix D was updated.